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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,  
  
Plaintiff,  
  
v.

**STIPULATION TO CONTINUE  
HEARING**

CONSUMER DEFENSE, LLC, a Nevada limited liability company; CONSUMER LINK, INC., a Nevada corporation; PREFERRED LAW, PLLC, a Utah professional limited liability company; AMERICAN HOME LOAN COUNSELORS, a Utah corporation; AMERICAN HOME LOANS, LLC, a Utah limited liability company; CONSUMER DEFENSE GROUP, LLC, f/k/a MODIFICATION REVIEW BOARD, LLC, a Utah limited liability company; CONSUMER HOME DEFENSE, LLC, a Utah limited liability company; BROWN LEGAL, INC., a Utah corporation; AM PROPERTY MANAGEMENT, LLC, a Utah limited liability company; FMG PARTNERS, LLC, a Utah limited liability company; ZINLY, LLC, a Utah limited liability company; JONATHAN P. HANLEY, in his individual and corporate capacity; BENJAMIN R. HORTON, in his individual and corporate capacity; and SANDRA X. HANLEY, in her individual and corporate capacity,

Case No: 2:18-cv-00030-JCM-BNW

Defendants.

COME NOW, the Defendants, CONSUMER DEFENSE, LLC; CONSUMER LINK, INC.; AMERICAN HOME LOAN COUNSELORS; AMERICAN HOME LOANS, LLC; CONSUMER DEFENSE GROUP, LLC F/K/A MODIFICATION REVIEW BOARD, LLC; BROWN LEGAL, INC.; FMG PARTNERS, LLC; ZINLEY, LLC; JONATHAN P. HANLEY; AND SANDRA X. HANLEY, by and through their attorney of record, and the Plaintiff, FEDERAL TRADE COMMISSION, by and through its attorneys of record, and hereby stipulate, agree and seek this Court's Order as follows:

1. On January 8, 2018, the FTC filed a complaint for permanent injunction and other equitable relief

1 against individuals Jonathan Hanley, Benjamin Horton<sup>1</sup>, and Sandra Hanley, and against the entities  
2 Consumer Defense, LLC (Nevada), Consumer Link, Inc. (the “Nevada Corporate Defendants”),  
3 Preferred Law, PLLC, American Home Loan Counselors, Consumer Defense Group, LLC, Consumer  
4 Defense, LLC (Utah), Brown Legal, Inc., AM Property Management, LLC, FMG Partners, LLC, and  
5 Zinly, LLC (the “Utah Corporation Defendants”) (all collectively the “Corporate Defendants”) . (ECF  
6 No. 1.)

7 2. On June 5, 2019, D. Brian Boggess entered his Notice of Appearance as Counsel for all of the  
8 Defendants, including the Corporate Defendants. (ECF No. 233.)

9 3. At the time Counsel entered his appearance, various discovery-related Motions were pending  
10 before the Court, including Defendants’ Emergency Motion to Extend Time Discovery. (ECF 216.)

11 4. That Motion, as well as other pending Motions, has now been set for Hearing before the Court ON  
12 July 8, 2019 at 10:00 a.m. (ECF 244.)

13 5. Counsel for Defendants has a conflict during the week of July 8, 2019, wherein he will be outside  
14 the reach of cellular phones and the internet while participating in a previously-scheduled fifty-mile  
15 backpacking trip with a group of scouts.

16 6. Given Counsel’s conflict, and the importance of the upcoming hearing on the outstanding  
17 discovery motions, the parties agree, stipulate and request that this Court continue the Hearing to a date  
18 and time convenient to the Court either before July 8, 2019 or on or after July 15, 2019.

19 7. The only dates in July which Counsel for the parties **can not** appear are: July 8-12, July 23 and July  
20 24, 2019. The undersigned Counsel will make themselves available any other July date.

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27 <sup>1</sup>On June 5, 2018, the Court entered a stipulated order for permanent injunction and  
28 monetary judgment as to Defendant Horton, who is no longer actively involved in this  
matter. (ECF No. 111.)

8. This stipulation is made in good faith among and at the request of the parties, and not for purposes of delay.

BOGGESS LAW GROUP

ALDEN F. ABBOTT, General Counsel

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Dated this 27<sup>th</sup> day of June, 2019.

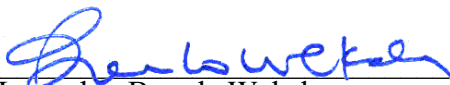
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*Attorneys for Plaintiff*

Dated this 27<sup>th</sup> day of June, 2019.

### ORDER

**IT IS ORDERED** that the hearing on the Emergency Motion to Extend Discovery (ECF No. 216) currently set for 7/8/2019 is **VACATED** and **CONTINUED** to 7/19/2019 at 11:00 a.m. in Courtroom 3B.

  
Honorable Brenda Weksler  
United States Magistrate Judge

Dated: July 2, 2019